

# **EXHIBIT 2**

[REDACTED]  
[REDACTED]

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

DAVID P. DONOVAN,

Plaintiff,

vs.

BETH A. WILKINSON,

Defendant.

No.: \_\_\_\_\_

**DECLARATION OF NORMAN CHIRITE IN SUPPORT OF  
DAVID DONOVAN'S MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, Norman Chirite, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this declaration in support of David Donovan's Motion for Temporary Restraining Order and Preliminary Injunction.

2. I am an attorney [REDACTED]  
[REDACTED]

3. In July 2020, the Team retained Beth Wilkinson of Wilkinson Walsh LLP (now known as Wilkinson Stekloff LLP), to conduct a privileged and confidential internal investigation and to advise the Team on management and mitigation of issues pertaining to alleged workplace harassment and culture at the Team.

4. [REDACTED], [REDACTED] I spoke by telephone with Ms. Wilkinson. At the outset of the discussion, Ms. Wilkinson [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] I then described [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]. I disclosed this information to Ms. Wilkinson because of concern [REDACTED]  
[REDACTED]

[REDACTED] wanted Ms. Wilkinson to understand [REDACTED]  
[REDACTED]  
[REDACTED]

5. [REDACTED] I personally delivered a photocopy [REDACTED]  
[REDACTED] [REDACTED] to Ms. Wilkinson [REDACTED] Due to the highly confidential nature of [REDACTED] [REDACTED] hard copy of this material had been stored [REDACTED] [REDACTED] [REDACTED] the copy [REDACTED]  
[REDACTED]  
[REDACTED]

6. Ms. Wilkinson and I spoke again on [REDACTED] after she [REDACTED]. She confirmed to me expressly that she had no intent or desire to disclose [REDACTED]  
[REDACTED]

7. A few days later, on [REDACTED] I received an email from [REDACTED]  
[REDACTED] indicating that he had received an email from an attorney at Ms. Wilkinson's firm stating that [REDACTED] all individuals were released [REDACTED] in order to speak [REDACTED]  
[REDACTED] [REDACTED] Upon receiving this email from [REDACTED] I immediately became concerned because we had a very clear understanding [REDACTED]

[REDACTED] I had not been involved in any communication with Ms. Wilkinson [REDACTED]  
[REDACTED] The Wilkinson firm's email [REDACTED]

8. As a result, I called Ms. Wilkinson and spoke with her on the phone [REDACTED]  
[REDACTED] The first time we spoke, early in the morning, we discussed [REDACTED]  
[REDACTED], and our call was not completed because she was travelling to a medical appointment and pressed for time. Since I was unable to address with her the [REDACTED]  
[REDACTED] I phoned her back later that day specifically in order to discuss that point. I told her that I was [REDACTED]  
[REDACTED] had no issue with employees or former employees speaking freely [REDACTED]

[REDACTED]  
[REDACTED] Second, I said that the foregoing did not apply to [REDACTED]  
[REDACTED]

[REDACTED] subject to further discussion. I made clear that [REDACTED]  
[REDACTED]

[REDACTED] That was the last time I spoke with Ms. Wilkinson.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 8, 2020.

[REDACTED]  
\_\_\_\_\_  
Norman Chirite

Exhibit 3

# **EXHIBIT 3**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

DAVID P. DONOVAN,

Plaintiff,

vs.

BETH A. WILKINSON,

Defendant.

No.: \_\_\_\_\_

**DECLARATION OF A. SCOTT BOLDEN**

I, A. Scott Bolden, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the law firm Reed Smith LLP and represent Daniel M. Snyder (“Mr. Snyder”) and Pro-Football Inc., d/b/a the Washington Football Team (the “Team”). I have personal knowledge of the facts stated below and would be competent to testify to them in court.

2. Attached as **Exhibit 1** to this declaration is a true and correct copy of my letter, [REDACTED] and accompanying exhibits, to Beth Wilkinson, a partner with the law firm Wilkinson Stekloff LLP. The letter copies Karen Popp, Esq., who I understand was David P. Donovan’s attorney.

3. Attached as **Exhibit 2** of this declaration is a true and correct copy of the letter I received from Beth Wilkinson [REDACTED]. The letter also copies Karen Popp, Esq.

4. Certain redactions to these Exhibits were made by my firm to protect personal or private information. The redactions are not in the original documents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 7, 2020

A large black rectangular redaction box covering the signature of the declarant.

A. Scott Bolden





# **EXHIBIT 3-1**



A. Scott Bolden  
[REDACTED]

Reed Smith LLP  
1301 K Street, N.W.  
Suite 1000 - East Tower  
Washington, D.C. 20005-3373  
+1 202 414 9200  
Fax +1 202 414 9299  
reedsmith.com

[REDACTED]  
Via Email [REDACTED]

Beth Wilkinson  
Wilkinson Walsh LLP  
2001 M Street NW, 10th Floor  
Washington, D.C. 20036

Re: [REDACTED]

Dear Ms. Wilkinson:

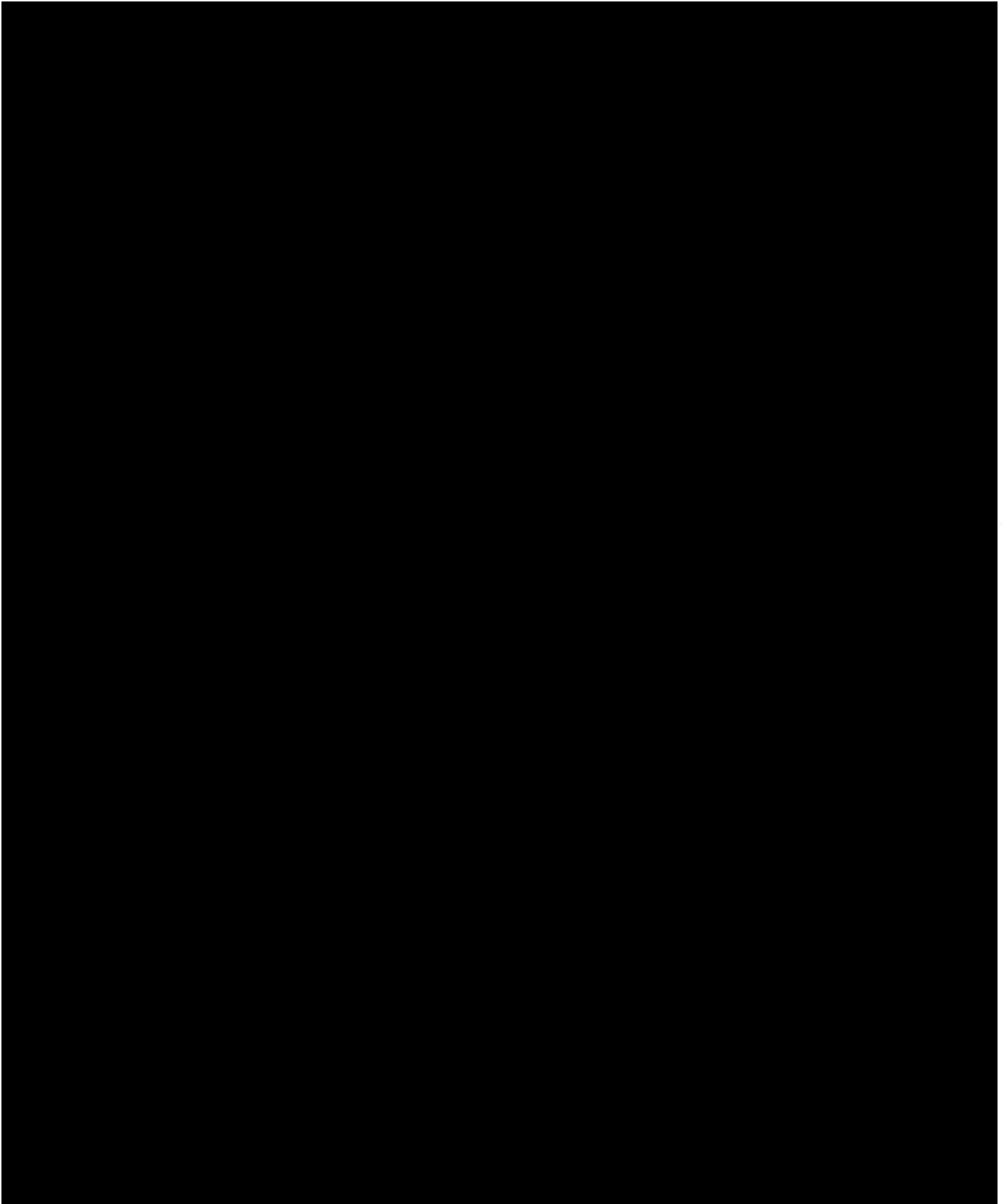
As you know, Reed Smith LLP represents Pro-Football, Inc. d/b/a the Washington Football Team (the "Team") and its majority owner, Daniel M. Snyder ("Mr. Snyder"). [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Beth Wilkinson

[REDACTED]

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ReedSmith



Beth Wilkinson

ReedSmith

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Sincerely, I am

A. Scott Bolden

Cc:

Beth Wilkinson

[REDACTED]

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ReedSmith

[REDACTED]

[REDACTED]

[REDACTED]

**Exhibit 1**

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

**Exhibit 2**